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Attorney for Defendant
WINNOW INFORMATION NETWORK LLC
dba COUPON HEAVEN

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

VINCENT KHOURY TYLOR, and VINCENT SCOTT TYLOR, Plaintiff, vs. WINNOW INFORMATION NETWORK LLC dba COUPON HEAVEN; JOHN DOES 1-10; JANE DOES 1-10; DOE CORPORATIONS 1-10; DOE PARTNERSHIPS 1-10; and DOE ASSOCIATIONS 1-10, Defendants.	CIVIL NO.: CV14-00324 DKW/BMK (Copyright Infringement) ANSWER OF DEFENDANT WINNOW INFORMATION NETWORK LLC dba COUPON HEAVEN; CERTIFICATE OF SERVICE

ANSWER OF DEFENDANT WINNOW
INFORMATION NETWORK LLC dba COUPON HEAVEN

Now comes Defendant **WINNOW INFORMATION NETWORK LLC dba COUPON HEAVEN** ("hereinafter referred to as "Defendant") by and through their attorney Lars Peterson and sets forth as and for its Answer to the Complaint of plaintiff in this action, filed July 18, 2014, alleges and avers as follows:

PARTIES

1. Denies knowledge and information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraphs 1, 2 and 4 of the plaintiff's complaint and therefore leaves plaintiff to his proof.

2. Admits the allegation in paragraph 3 of the complaint as to the name.

JURISDICTION AND VENUE

3. Denies knowledge and information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraphs 5, 6 and 7 of the plaintiff's complaint, and respectfully refers all matters of law to the Court.

4. Denies that defendant does sufficient business or has sufficient minimum contacts in the State of Hawaii to properly place this matter before this court or to satisfy long-arm jurisdiction as to the defendant.

FACTUAL ALLEGATIONS

5. Defendant admits the allegations in paragraphs 8, 13, and 14 of the plaintiff's complaint.

6. Defendant denies the allegations in paragraphs 9, 10, 11, and 12 of the plaintiff's complaint and further denies that defendant does sufficient business or has sufficient minimum contacts in the State of Hawaii to properly place this matter before this court or to satisfy long-arm jurisdiction as to the defendant.

7. Denies knowledge and information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 15, 16, 17, and 18 of the plaintiff's complaint, and respectfully refers all matters of law to the Court.

8. Denies knowledge and information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraphs 19, 20, 21 and 22 of the plaintiff's complaint, and therefore leaves plaintiff to his proof

9. Denies the allegations contained in paragraphs 23, 24, 25, and 26 of the plaintiff's complaint.

10. Denies the allegations contained in paragraphs 27 and 28 of the complaint except admits that plaintiff did send a letter regarding the subject images to the defendant.

ANSWERING THE FIRST CAUSE OF ACTION

11. Defendant repeats and realleges the responses in this answer at paragraphs 1 through 10 inclusive as if fully set forth herein in response to paragraph 29 of the plaintiff's complaint.

12. Denies and willful action and denies knowledge and information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 30 and 31 of the plaintiff's complaint, and respectfully refers all matters of law to the court.

13. Denies the allegations contained in paragraphs 32 through 40, inclusive of the plaintiff's complaint.

ANSWERING THE SECOND CAUSE OF ACTION

14. Defendant repeats and realleges the responses in this answer at paragraphs 1 through 15 inclusive as if fully set forth herein in response to paragraph 41 of the plaintiff's complaint.

15. Denies the allegations contained in paragraph 42 through 47 of the plaintiff's complaint.

FIRST DEFENSE

The court lacks jurisdiction over the defendant in that defendant does insufficient business or has insufficient minimum contacts in the State of Hawaii to properly place this matter before this court or to satisfy long-arm jurisdiction as to the defendant.

SECOND DEFENSE

There was no actionable infringement of plaintiff's work.

THIRD DEFENSE

Plaintiff suffered no or *de minimus* damage.

FOURTH DEFENSE

Plaintiff's claim is barred by the doctrine of laches.

FIFTH DEFENSE

Any alleged display of plaintiff's images or any alleged infringement was not willful.

SIXTH DEFENSE

Plaintiff failed to mitigate his damages.

RESERVATION OF RIGHTS AND DEFENSES

Defendant reserves the right to supplement and amend this answer with any additional defenses or counter-claims which may be revealed or ascertained through the course of investigation and discovery.

WHEREFORE defendant demands judgment in its favor, dismissal of the complaint, interest, costs and disbursements and such other and further relief as the court deems just and proper.

DATED: Honolulu, Hawaii, September 5, 2014.

/s/ Lars Peterson
LARS PETERSON
Attorney for Defendant
WINNOW INFORMATION NETWORK
LLC dba COUPON HEAVEN